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FILED

JUN 04 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No. 24 CR 180-JDR

Plaintiff,

INDICTMENT

v.

**[COUNT ONE: 18 U.S.C. §§ 1151, 1152, and 113(a)(8) – Assault of an Intimate/Dating Partner by Strangling in Indian Country;
COUNT TWO: 18 U.S.C. §§ 1151, 1152, and 2244(a)(1) – Abusive Sexual Contact by Force and Threat in Indian Country;
COUNT THREE and SEVEN: 18 U.S.C. § 1512(b)(1) – Tampering with a Witness by Intimidation, Threats, and Corrupt Persuasion;
COUNT FOUR: 18 U.S.C. §§ 1151, 1152, and 2242(3) – Sexual Abuse Without Consent in Indian Country;
COUNT FIVE: 18 U.S.C. §§ 2261A(2)(A) and 2261(b) – Cyberstalking;
COUNT SIX: 18 U.S.C. § 1512(b)(3) – Tampering with a Witness by Intimidation, Threats, and Corrupt Persuasion]**

MICHAEL VINCENT MARTIN,

Defendant.

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. §§ 1151, 1152, and 113(a)(8)]**

On or about February 26, 2023, within Indian Country in the Northern District of Oklahoma, the defendant, **MICHAEL VINCENT MARTIN**, a non-Indian, assaulted B.R., an Indian known to the Grand Jury, who was **MARTIN's** intimate and dating partner, by strangling and attempting to strangle her.

All in violation of Title 18, United States Code, Sections 1151, 1152, and 113(a)(8).

COUNT TWO
[18 U.S.C. §§ 1151, 1152, and 2244(a)(1)]

On or about February 26, 2023, within Indian Country in the Northern District of Oklahoma, the defendant, **MICHAEL VINCENT MARTIN**, a non-Indian, knowingly engaged in and attempted to engage in sexual contact with B.R., a person known to the Grand Jury, by force and threat.

All in violation of Title 18, United States Code, Sections 1151, 1152, and 2244(a)(1).

COUNT THREE
[18 U.S.C. § 1512(b)(1)]

On or about November 23, 2023, in the Northern District of Oklahoma, the defendant, **MICHAEL VINCENT MARTIN**, knowingly used intimidation, threatened, and corruptly persuaded B.R., a person known to the Grand Jury, and attempted to do so, with intent to influence, delay, and prevent the testimony of a person in an official proceeding.

All in violation of Title 18, United States Code, Section 1512(b)(1).

COUNT FOUR
[18 U.S.C. §§ 1151, 1152, and 2242(3)]

On or about March 17, 2024, within Indian Country in the Northern District of Oklahoma, the defendant, **MICHAEL VINCENT MARTIN**, a non-Indian, engaged and attempted to engage in a sexual act with B.R., an Indian known to the Grand Jury, without B.R.'s consent.

All in violation of Title 18, United States Code, Sections 1151, 1152, and 2242(3).

COUNT FIVE
[18 U.S.C. §§ 2261A(2)(A) and 2261(b)]

From on or about March 18, 2024, through on or about May 9, 2024, in the Northern District of Oklahoma and elsewhere, the defendant, **MICHAEL VINCENT MARTIN**, with the intent to harass and intimidate, used the mail, any interactive computer service, electronic communication service, electronic communication system of interstate and foreign commerce, and any other facility of interstate commerce, including, but not limited to, email, social media, and telephone, to engage in a course of conduct that caused and would be reasonably expected to cause substantial emotional distress to B.R., a person known to the Grand Jury.

All in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261(b).

COUNT SIX
[18 U.S.C. § 1512(b)(3)]

From on or about March 18, 2024, to on or about May 4, 2024, in the Northern District of Oklahoma, the defendant, **MICHAEL VINCENT MARTIN**, knowingly used intimidation, threatened, and corruptly persuaded B.R., a person known to the Grand Jury, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer of information relating to the possible commission of a federal offense.

All in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT SEVEN
[18 U.S.C. § 1512(b)(1)]

From or about May 5, 2024, to on or about May 9, 2024, in the Northern District of Oklahoma, the defendant, **MICHAEL VINCENT MARTIN**, knowingly used intimidation, threatened, and corruptly persuaded B.R., a person known to the Grand Jury, and attempted to do so, with intent to influence, delay, and prevent the testimony of a person in an official proceeding.

All in violation of Title 18, United States Code, Section 1512(b)(1).

CLINTON J. JOHNSON
United States Attorney

A TRUE BILL



STACEY P. TODD
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson